

FILED

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

AUG 20 2020

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
BONMENE SIBE, )  
 )  
Defendant. )

**4:20CR00419 SEP/SPM**

**MOTION FOR PRE-TRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Tracy L. Berry, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate.

As and for its grounds, the Government states as follows:

1. Defendant is charged with Title 18, United States Code, Sections: 1349 (conspiracy to commit mail fraud, wire fraud, and use of an assumed and fictitious name); 1028A (aggravated identity theft); 1341 (mail fraud); and, 1001 (making a false statement);
2. The underlying conduct has resulted in the victimization and manipulation of more than 40 women between the ages of 41 and 82 through the online scheme;
3. Defendant has access to foreign bank accounts and substantial ties outside the United States;

4. The charges could result in the imposition of a significant sentence in the event of a conviction of the charges; and,
5. Pursuant to Title 18, United States Code, Section 3142(g), detention is appropriate based upon: the weight of the evidence against defendant; the potential sentence if defendant is convicted; economic danger to the community; and, risk of flight.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required, and the safety of any other person and the community, and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

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UNITED STATES ATTORNEY

/s/ Tracy L. Berry  
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